

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

STATE OF TEXAS, ET AL.;  
*Plaintiffs,*

*v.*

UNITED STATES OF AMERICA, ET AL.;  
*Defendants,*

*and*

KARLA PEREZ, ET AL.;  
STATE OF NEW JERSEY,  
*Defendant-Intervenors.*

Case No. 1:18-cv-00068

**PLAINTIFF STATES' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS  
ON THEIR COMBINED REPLY IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT AND  
MEMORANDUM IN OPPOSITION TO ALL CROSS-MOTIONS FOR SUMMARY JUDGMENT**

Plaintiffs respectfully request that the Court grant permission to exceed the 20-page briefing limit for their combined Reply in Support of their Motion for Summary Judgment and Memorandum in Opposition to All Cross-Motions for Summary Judgment. This briefing responds to 135 pages of cross-motions. Plaintiffs could have filed separate responses for each; instead, Plaintiffs are filing all in a single document and seek a 60-page limit. This would be no greater than separate filings to all three cross-motions within the standard 20-page limit. This briefing raises complex issues in a case of national importance, and Plaintiffs require these extra pages to adequately present these issues to the Court. Plaintiffs seek this extension for good cause and in the interest of justice, not for delay, and no party will be prejudiced if the extension is granted. Counsel for all other parties have indicated they do not oppose this request.

Date: April 6, 2023

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Respectfully submitted.

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**CERTIFICATE OF CONFERENCE**

I certify that on April 6, 2023, counsel for Plaintiffs Ryan Walters conferred with counsel for the other parties in this case via email.

James Walker, counsel for Defendants United States of America, et al., Nina Perales, counsel for Defendant-Intervenors Karla Perez, et al., and Mayur Saxena, counsel for Defendant-Intervenor State of New Jersey, represented that the parties whom they represent, respectively, do not oppose the relief requested by Plaintiffs.

/s/ Ryan D. Walters  
RYAN D. WALTERS

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed and served electronically (via CM/ECF) on April 6, 2023.

/s/ Ryan D. Walters  
RYAN D. WALTERS